

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA	X	
	:	
	:	
-against-	:	Hon. Jed S. Rakoff
	:	
MONZER AL KASSAR,	:	S3 07 Cr. 354 (JSR)
TAREQ MOUSA AL GHAZI, and	:	
LUIS FELIPE MORENO GODOY	:	
	:	
Defendants.	:	
	:	
	X	

**NOTICE OF MOTION FOR RECONSIDERATION OF THE
COURT'S OPINION AND ORDER DENYING DEFENDANTS'
MOTION FOR RULE 15 DEPOSITIONS**

PLEASE TAKE NOTICE, that on behalf of defendants Monzer Al Kassar, Tareq Mousa Al Ghazi, and Luis Felipe Moreno Godoy (collectively, "Defendants"), the undersigned counsel respectfully: (a) moves this Court to reconsider and vacate its August 18, 2008 Opinion and Order, and permit Defendants to take a videotaped deposition in Spain of Inspector Jose M. Villarejo pursuant to Rule 15 of the Federal Rules of Criminal Procedure; and, alternatively, (b) requests an opportunity to argue orally the motion at a session to be held before the Honorable Jed S. Rakoff, at the Moynihan Federal Courthouse, located at 500 Pearl Street, New York, New York, on a date and time to be determined by the Court,.

Dated: New York, New York
August 20, 2008

Respectfully submitted,

DICKSTEIN SHAPIRO, LLP

By: 

Ira Lee Sorkin

Nicole DeBello

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CERTIFICATE OF SERVICE

I, Elliott Z. Stein, an attorney, hereby certify that on August 20, 2008, I caused to be electronically filed Defendants' Motion for Reconsideration of the Court's Opinion and Order Denying Defendants' Motion for Rule 15 Depositions, and supporting Memorandum of Law, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. Stein', is written over a horizontal line.

Elliott Z. Stein